

Christian Holinka v. Asbestos - ROUGH DRAFT  
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1 Christian Holinka 162  
2 the rooms that you specifically worked in where you  
3 say the Bunsen burners were?  
4 A Well, one room they may have converted into  
5 offices, I believe, and one other laboratory I saw  
6 still was used as a laboratory.  
7 Q During the time that you worked there as  
8 the assistant professor, did the physical layout of  
9 the Bunsen burners change in any way?  
10 A No.  
11 Q Were any added or removed during that time  
12 period?  
13 A To the best of my knowledge, no.  
14 Q And what did you use the mittens for there?  
15 A To handle hot glassware.  
16 Q Associated with the burners?  
17 A Associated with the burners and associated  
18 with hot glassware from drying ovens.  
19 Q Are there any other ways that you believe  
20 that you were exposed to asbestos from working at  
21 Mount Sinai as an assistant professor in this lab  
22 besides those we have talked about?  
23 A Not to my knowledge, no.  
24 Q During the time that you worked there, were  
25 you aware of any program of asbestos abatement or

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1 Christian Holinka 163  
2 removal of any products from the 20th floor?  
3 A No, I was not.  
4 Q Or within the Annenberg Building itself.  
5 A No, I was not.  
6 Q Did the physical appearance of the pads  
7 from the last time you used them seem substantially  
8 similar to that when you first encountered them years  
9 ago?  
10 A They were substantially similar.  
11 Q Were there any physical differences that  
12 you could note from the last time that you used them  
13 at Mount Sinai from the first time that you used them?  
14 A No.  
15 Q Why did you leave Mount Sinai?  
16 A May I make an additional remark during that  
17 period?  
18 Q Yes, sir.  
19 A If it's relevant. I had for two years an  
20 adjunct professorship at NYU entirely teaching and for  
21 one year at Fordham University entirely teaching.  
22 Q We have some records of your Social  
23 Security printout and they indicate that you were at  
24 Fordham apparently in 1978, 1979 and 1981; does that  
25 sound about right?

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1 Christian Holinka 164  
2 A It does, yes. They know it better than I.  
3 Q Well, that's fair enough. Let me ask you  
4 with respect to any of the time that you were at  
5 Fordham, all of those jobs would have been of an  
6 academic teaching nature?  
7 A That's correct.  
8 Q And not any lab work?  
9 A No.  
10 Q And do you allege any asbestos exposure  
11 during the time you were working at Fordham?  
12 A Not to my knowledge.  
13 Q Was this the campus that was up in the  
14 Bronx?  
15 A No. It was the Lincoln Center Building.  
16 Q And you said you were also at NYU --  
17 A Yes.  
18 Q -- for a period of time teaching classes?  
19 A Yes.  
20 Q The records we have indicate that you may  
21 have been there in 1979 and 1980 and then again in  
22 1987; does that sound about right?  
23 A That sounds about correct, yes.  
24 Q With respect to all of those employments,  
25 were they all of an academic teaching nature?

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1 Christian Holinka 165  
2 A That's correct, yes.  
3 Q Do you believe that you were exposed to  
4 asbestos in any way during any of your employments  
5 with New York University?  
6 A Not to my knowledge.  
7 Q As long as we have this, let me just go  
8 back a second and go over some other employers if I  
9 may. Do you remember working for a place called The  
10 Continental House back in the 1950's? A real brief  
11 employment.  
12 A The Continental House, that was the  
13 Commodore Hotel.  
14 Q That is at least what you associate it  
15 with.  
16 A Yes.  
17 Q Do you remember working for someone called  
18 Charles Shaw in about 1959?  
19 A No, I don't.  
20 Q We have an address of Indianapolis,  
21 Indiana.  
22 A That's the year I got out of the Army, I  
23 worked at Booth Memorial.  
24 Q It does not ring any bells?  
25 A No.

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<p>1 Christian Holinka 166</p> <p>2 Q Did you ever work for the Board of</p> <p>3 Education for the City of New York in the late 1970's?</p> <p>4 A No.</p> <p>5 Q Or you do not remember it at least if you</p> <p>6 did.</p> <p>7 A I would remember if I did.</p> <p>8 Q Why did you leave Mount Sinai?</p> <p>9 A It was increasingly more difficult to</p> <p>10 obtain grant support at the time and on the basis of</p> <p>11 my numerous publications in reproductive medicines, I</p> <p>12 applied to the pharmaceutical industry.</p> <p>13 Q When did you start publishing articles with</p> <p>14 respect to reproductive literature?</p> <p>15 A Well, in the broader sense reproductive</p> <p>16 biology, my first publication at Berkeley, I think it</p> <p>17 appeared in 1969.</p> <p>18 Q And what did it appear in?</p> <p>19 A Endochronology. It's a professional</p> <p>20 journal.</p> <p>21 Q Let's take the time period from that up</p> <p>22 until when you left Mount Sinai, approximately how</p> <p>23 many articles did you publish or have published?</p> <p>24 A Well, original research, probably '55.</p> <p>25 Q Were they all generally associated with</p>	<p>1 Christian Holinka 168</p> <p>2 A And that was in Climacteric, which is an</p> <p>3 international journal for post-menopausal medicine.</p> <p>4 Q Have you ever written any articles with</p> <p>5 respect to the subject of asbestos or any asbestos</p> <p>6 related illnesses or diseases?</p> <p>7 A No.</p> <p>8 Q When you were at Mount Sinai, were you</p> <p>9 aware of any physicians there who had a specialty in</p> <p>10 pneumonconioses or other breathing related illnesses?</p> <p>11 A I was not.</p> <p>12 Q Since your time at Mount Sinai, have you</p> <p>13 become aware of any physicians there who do have such</p> <p>14 specialties?</p> <p>15 A Well, now I know, or a few years ago</p> <p>16 Dr. Selikoff, who is a major name or was a major name</p> <p>17 in the field, but there was no interaction.</p> <p>18 Q Was he there when you were there?</p> <p>19 A I believe he was. I don't know when he</p> <p>20 retired.</p> <p>21 Q In any event your work there had nothing to</p> <p>22 do with whatever work he was doing?</p> <p>23 A None.</p> <p>24 Q Or any work that was being done by his</p> <p>25 assistants or adjunct or support staff.</p>
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<p>1 Christian Holinka 167</p> <p>2 reproductive biology?</p> <p>3 A They were all associated with reproductive</p> <p>4 biology ranging from hormone metabolism to</p> <p>5 physiological changes in animals.</p> <p>6 Q What types of journals or publications did</p> <p>7 these articles show up in?</p> <p>8 A Professional journals, the Journal of</p> <p>9 Steroid Biochemistry and Molecular Biology, Biology of</p> <p>10 Reproduction. There was one or two more I don't</p> <p>11 remember at the moment.</p> <p>12 Q Since your time at Mount Sinai, have you</p> <p>13 continued to publish original works?</p> <p>14 A (No verbal response given)</p> <p>15 Q If you do not understand the question, I</p> <p>16 can try to rephrase it.</p> <p>17 A I understand the question but I do not have</p> <p>18 a ready answer. The answer is basically yes.</p> <p>19 Q Would those be articles that would be</p> <p>20 appearing in the same types of journals that you</p> <p>21 mentioned?</p> <p>22 A They were more medically related articles</p> <p>23 or the latest publication came out two, three months</p> <p>24 ago.</p> <p>25 Q What was that in?</p>	<p>1 Christian Holinka 169</p> <p>2 A No.</p> <p>3 Q Who was your next employer after you left</p> <p>4 Mount Sinai then?</p> <p>5 A Organon, Inc.</p> <p>6 Q O-R-G-A-N-O-N?</p> <p>7 A Yes.</p> <p>8 Q And how long did you work for Organon?</p> <p>9 A 1989 to 1992.</p> <p>10 Q What did you do for them?</p> <p>11 A I started as a director in reproductive</p> <p>12 medicine, hormonal replacement therapy and then was</p> <p>13 the head of reproductive medicine research.</p> <p>14 Q And this was, is it fair to say,</p> <p>15 pharmaceutical company that developed medications for</p> <p>16 those types of things?</p> <p>17 A Yes.</p> <p>18 Q Do you have any reason to believe that you</p> <p>19 were exposed to asbestos during the time that you</p> <p>20 worked with Organon?</p> <p>21 A No, I do not.</p> <p>22 Q You did not do any lab work at all of any</p> <p>23 nature?</p> <p>24 A No.</p> <p>25 Q What was your next employer after Organon?</p>

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1 Christian Holinka 170  
2 A Johnson and Johnson, Robert Wood Johnson  
3 Pharmaceutical Research Institute.  
4 Q I'm sorry, backing up to Organon, where did  
5 you work out of for them?  
6 A West Orange, New Jersey.  
7 Q When you worked for Johnson and Johnson,  
8 where was that?  
9 A Raritan, New Jersey.  
10 Q How long did you work for Johnson and  
11 Johnson?  
12 A 1992 to '96.  
13 Q What positions did you hold there for them?  
14 A Assistant director in endochronology and  
15 metabolism.  
16 Q And that was the only position?  
17 A That was the only position.  
18 Q Do you have any reason to believe that you  
19 were exposed to asbestos during the time that you  
20 worked at Johnson and Johnson?  
21 A No, I have no reason to believe that.  
22 Q What was your next employer?  
23 A Kyowa Hakko Kogio.  
24 Q I have K-Y-O-W-A, right?  
25 A Yes.

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1 Christian Holinka 172  
2 Johnson and Kyowa, did you receive additional  
3 compensation for either products you helped develop or  
4 any other additional incomes besides the salary that  
5 you would have been earning from these companies?  
6 A No, I did not.  
7 Q Did you have any self-employment outside of  
8 the work that you were doing for these companies?  
9 A No, I did not.  
10 Q Your Social Security records indicate  
11 self-employment in 1992 and 1996.  
12 A Oh, yeah. May have been -- 1996, that's  
13 right. Okay, '92, at one point I started out of my  
14 apartment a small music book journal enterprise which  
15 was a loss, so I don't consider it as any kind of  
16 lucrative employment. This is what they may refer to.  
17 Q We have an indication that you earned  
18 through self-employment in 1992 almost \$70,000, could  
19 that be --  
20 A No, that's, that's --  
21 Q -- accurate?  
22 A That's not correct, no. And that was in  
23 1992.  
24 Q Yes, sir.  
25 A No.

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1 Christian Holinka 171  
2 Q Do you have any idea how to spell --  
3 A The rest? I should know. H-A-K-K-O and  
4 new word Kogio; K-O-G-I-O.  
5 Q That's close enough if that's not right.  
6 How long did you work for Kyowa?  
7 A Nine months.  
8 Q What did you do for them?  
9 A Clinical research.  
10 Q Did you hold a position?  
11 A Director of pharmaceutical development.  
12 Q Do you believe that you were exposed to  
13 asbestos as there?  
14 A No, I don't.  
15 Q During the time that you were employed  
16 by --  
17 A I should say I don't believe so. I don't  
18 know whether I was but I don't think so.  
19 Q Nothing as you sit here today comes to you  
20 and says maybe I was exposed through this?  
21 A In this case?  
22 Q Yes, in this case right here.  
23 A I do not believe so, no.  
24 Q Now, during the time that you worked for  
25 these last few outfits, Organon and Johnson and

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1 Christian Holinka 173  
2 Q In 1996 after -- well, why did you leave  
3 Kyowa?  
4 A No, in 1992, that is the end period at  
5 Organon and I -- wait a minute. It could be correct  
6 because my negotiations with Johnson and Johnson took  
7 a few months and head of Organon asked me to stay on  
8 as a consultant.  
9 Q I see.  
10 A So, I stand corrected, it could be correct,  
11 yes.  
12 Q So, though it would be technically, perhaps  
13 in terms of the IRS, self-employment it was consulting  
14 work for Organon in 1992?  
15 A Yes. After I had formerly resigned.  
16 Q And why did you leave Kyowa?  
17 A Johnson and Johnson phoned me whether I  
18 would want to do full-time consulting for them, both  
19 at Raritan and in Europe in their international  
20 division in Switzerland.  
21 Q Did that seem like an opportunity you  
22 wanted to take?  
23 A Yes?  
24 Q And did you take it?  
25 A I took that. And also this was my field,

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1 Christian Holinka 174  
2 this is where my authority lay, my knowledge and so  
3 forth.  
4 Q And have you engaged in this consulting  
5 arrangement with Johnson and Johnson since 1996?  
6 A No.  
7 Q How long were you a consultant for Johnson  
8 and Johnson?  
9 A I had a number of other clients. This is  
10 going to be difficult to answer because I worked by  
11 project. The full-time period lasted about two years.  
12 Q When you were exclusively or primarily  
13 supporting Johnson and Johnson?  
14 A At that time, yes. Unless you find  
15 something else there, those smaller time periods are  
16 sometimes difficult to recall.  
17 Q And since that two year or so period, have  
18 you done consulting work for a variety of different  
19 clients?  
20 A Yes.  
21 Q Let's say in 2005 can you give me an idea  
22 of who the clients were that you primarily consulted  
23 for?  
24 A For that specific year I could not but for  
25 the overall period that I was working independent, I

1 Christian Holinka 176  
2 MR. SCHAFFER: I am entitled to probe his  
3 memory about this because I have a series of  
4 questions that follow in relation to it.  
5 MR. DARCHE: If he knows he knows but if he  
6 doesn't he doesn't.  
7 Q This is one of those times, sir, a best  
8 estimate is okay as opposed to down to the penny.  
9 What is your best estimate?  
10 A My best estimate is around \$180,000.  
11 Q In 2006 do you know how much you earned?  
12 A Best estimate about \$100,000.  
13 Q Are you still consulting today?  
14 A Yes.  
15 Q Did you file your 2006 tax return yet?  
16 A No.  
17 Q Besides the consulting work that you do for  
18 these various companies, do you have any other sources  
19 of income?  
20 A I'm getting Social Security and a pension  
21 from J and J, Johnson and Johnson.  
22 Q How much is the pension?  
23 A \$511 monthly.  
24 Q And is the Social Security you receive  
25 standard as opposed to disability?

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1 Christian Holinka 175  
2 have been a consultant for Organon after this period  
3 immediately following my employment. I have been  
4 consulting and still am consulting for Wyeth  
5 (phonetic) Pharmaceuticals. I have been and still am  
6 consulting for Pantarhei, I will spell that;  
7 P-A-N-T-A-R-H-E-I, Bioscience. It's a Dutch company.  
8 I have been consulting for Serrol. I have a feeling  
9 I'm missing something.  
10 Q This would be one of those times if it  
11 comes to you, would you tell us later?  
12 A Yes. I have been consulting for Ortho also  
13 but that's Johnson and Johnson.  
14 Q On any of those consulting jobs that you  
15 have been on since 1996, do you have any reason to  
16 believe you were exposed to asbestos?  
17 A I have no reason to believe so.  
18 Q In 2005 do you have an understanding as to  
19 approximately how much money you earned through the  
20 consulting business?  
21 A In 2005 I would guess about --  
22 MR. DARCHE: Don't guess.  
23 A I would estimate about --  
24 MR. DARCHE: Objection. We are turning  
25 over all the lost wages, so --

1 Christian Holinka 177  
2 A Standard.  
3 Q And how much do you receive through that?  
4 A About \$1,200 a month. And then I have a  
5 pension from Mount Sinai of \$71 a month.  
6 Q Do you doing this consulting work have your  
7 own business or business entity that you refer to  
8 yourself as?  
9 A I have a name, Farm Consult, for my firm.  
10 I do not have any employees.  
11 Q Is that incorporated?  
12 A No.  
13 Q Is it any sort of a formal business  
14 association or is it more like doing business as?  
15 A I registered it in, I don't know, either  
16 the City or the County of New York. I believe the  
17 County of New York.  
18 Q When did you register it?  
19 A In 1996 or '97.  
20 Q And is the operating address that you used  
21 on the registration where you live?  
22 A I believe so, I'm not sure.  
23 Q Has it ever had any physical offices or  
24 space separate from where you live besides perhaps a  
25 mail drop somewhere?

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1 Christian Holinka 178  
2 A Well, I used to work most of the time at my  
3 condo, a small condo on 7th Avenue but now at my  
4 apartment.  
5 Q And my colleague asked you some questions  
6 about where you currently live, do you own the  
7 premises where you currently live?  
8 A No.  
9 Q Do you own any real estate currently?  
10 A I own the apartment, the condo on 147th  
11 Avenue.  
12 Q Is there a mortgage outstanding on that?  
13 A No.  
14 Q Do you currently have a tenant there or  
15 rent it out?  
16 A No.  
17 Q And what do you use that space for, if  
18 anything?  
19 A A friend is living in there.  
20 Q Are there any other jobs that you have held  
21 in your life that we have not talked about today that  
22 you can recall?  
23 A No, there are not.  
24 Q Are there any other ways that you believe  
25 you were exposed to asbestos besides those we have

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1 Christian Holinka 179  
2 already discussed today?  
3 A No, there are not.  
4 Q Have you told us the names of all of the  
5 companies that you believe may have some involvement  
6 with respect to the products that you believe caused  
7 you asbestos exposure?  
8 A To my knowledge, yes, I have told you.  
9 Q Do you have any product catalogs from any  
10 of the years that you were working either at Sinai or  
11 any of the other places where you were going to  
12 school?  
13 A Do I currently have those?  
14 Q Yes.  
15 A No, I don't.  
16 Q Do you know anybody who has any of these  
17 catalogs besides and excluding any that might be in  
18 your attorney's possession?  
19 A No, I don't.  
20 Q When you were taking classes in the various  
21 educations that you have gone through, was the subject  
22 of asbestos and asbestos health hazards ever  
23 discussed?  
24 A No.  
25 Q Do you subscribe to any medical journals?

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1 Christian Holinka 180  
2 A Currently not but I did regularly subscribe  
3 to a whole number of them.  
4 Q Can you give me an idea about what journals  
5 you regularly subscribed to?  
6 A Basic and Clinical Aspects of Reproductive  
7 Medicine.  
8 Q Any others?  
9 A No.  
10 Q That's it?  
11 A That's it.  
12 Q How long did you maintain that  
13 subscription?  
14 A Over the years, 20 years, 30 years.  
15 Q And was --  
16 A But may I add something?  
17 Q Yes.  
18 A I had access to those journals through the  
19 laboratories, through libraries, through my companies  
20 that I consulted for, so I read those journals  
21 regularly.  
22 Q What journals?  
23 A Menopause, Climacteric Journal of  
24 Reproductive Medicine, Fertility Sterility, other  
25 journals in that area, endochronologic, gynecologic,

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1 Christian Holinka 181  
2 endochronology.  
3 Q Were you ever involved in any litigation  
4 brought against any of the pharmaceutical companies  
5 that you worked for, either as a defendant or as a  
6 witness for the companies?  
7 MR. DARCHE: I am just going to object to  
8 that question.  
9 MR. SCHAFFER: What is the basis?  
10 MR. DARCHE: Relevance. I am trying to  
11 think if it was asked at the last deposition  
12 whether you have ever been deposed before.  
13 MR. SCHAFFER: My question is a little bit  
14 different.  
15 THE WITNESS: May I answer?  
16 MR. DARCHE: Yes.  
17 A No, I have not been involved.  
18 Q When was the first time that you became  
19 aware that asbestos could cause adverse health  
20 conditions?  
21 A Ten years ago, an estimate.  
22 Q How did you come to learn that?  
23 A Through the press, television, popular  
24 media.  
25 Q Do you associate any particular type of



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1 Christian Holinka 182  
2 event or incident that the press, T.V. or popular  
3 media was reporting on ten years ago?  
4 MR. DARCHE: Objection.  
5 Q In association with asbestos.  
6 MR. DARCHE: I just object to the form.  
7 Q You can answer.  
8 MR. DARCHE: I think the question is --  
9 MR. SCHAFER: Ben, please, the question is  
10 pretty straight forward and it is one that I ask  
11 at every deposition. And the witness is  
12 obviously a very intelligent person. If he does  
13 not understand the question, he will tell me.  
14 MR. DARCHE: Do you understand the  
15 question?  
16 A Would you repeat the question.  
17 Q You told me that about ten years ago it was  
18 about that time that you became aware of asbestos and  
19 health hazards associated with it. When I asked you  
20 how you responded press, television and popular media,  
21 your words.  
22 A Yes.  
23 Q My question is was there any singular or  
24 series of events ten years ago that you associated  
25 with coming to this knowledge about asbestos hazards.

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1 Christian Holinka 183  
2 A No, I don't. I would like to make another  
3 remark if I may.  
4 Q Sure.  
5 A In the course I taught at NYU, there was  
6 certainly topics of carcinogenesis. To the best of my  
7 knowledge, I did not include asbestos.  
8 Q Was that course associated with carcinogens  
9 relating to reproductive issues?  
10 A That also, yes, breast cancer.  
11 MR. DARCHE: Answer the question that he is  
12 asking you.  
13 Q That is all I am looking for.  
14 Is there any additional schooling that you  
15 have been through that we have not gone over today?  
16 A No.  
17 Q Were you ever injured in an on-the-job  
18 accident in which you filed a worker's compensation  
19 claim?  
20 A No, I wasn't.  
21 Q Have you ever been diagnosed with  
22 pneumonia?  
23 A No.  
24 Q Bronchitis?  
25 A No.

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1 Chronic obstructive pulmonary disease or  
2 COPD?  
3 A No.  
4 Q Asthma?  
5 A No.  
6 Q Emphysema?  
7 A No.  
8 Q Do you have any allergies?  
9 A Penicillin.  
10 Q When did you learn you were allergic to  
11 Penicillin?  
12 A About 15 years ago.  
13 Q Do you have to do anything with respect to  
14 that, tell your physicians not to prescribe it to you,  
15 anything like that?  
16 A They ask routinely about your allergies.  
17 Q Did you ever smoke, sir?  
18 A No.  
19 Q At all.  
20 A At all, no.  
21 Q If there is any reference in your medical  
22 records to previously having smoked, do you have any  
23 understanding as to why that would be there?  
24 MR. DARCHE: I am going to object to the  
25

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1 form of that question.  
2 A No. Because it shouldn't be there because  
3 I never smoked.  
4 Q You have been seen by a number of doctors  
5 over the course of your life; is that fair to say?  
6 A Yes.  
7 Q Including most recently and perhaps not so  
8 recently; is that right?  
9 A Yes.  
10 Q When these doctors would examine you, would  
11 they on occasion ask you background questions about  
12 your past health history, past habits, employment,  
13 things like that?  
14 A Yes.  
15 Q When you were asked those questions, did  
16 you do your best to answer them truthfully and  
17 accurately?  
18 A Yes.  
19 Q Did you ever intentionally withhold any  
20 information when you were posed any of those questions  
21 by any of your doctors?  
22 A No.  
23 Q When was the first time in your life that  
24 you would have been hospitalized for any reason?  
25

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1 Christian Holinka 186  
2 A Last --  
3 Q Meaning an overnight stay.  
4 A In the last year, late July -- I'm sorry,  
5 August, late to mid-August.  
6 Q And is that hospitalization in connection  
7 with what you understand to be your current illness?  
8 A Yes, it is.  
9 Q When you were growing up, did you have a  
10 family doctor or a general practitioner that your  
11 family would take you to if you were ill?  
12 A No, I didn't.  
13 Q When you came to the States, did you  
14 eventually have a doctor who held that role as family  
15 doctor or general practitioner?  
16 A No.  
17 Q During the time that you were married, did  
18 you and your wife have anybody that would meet that  
19 role?  
20 A No.  
21 Q When was the first time that you can recall  
22 going to a doctor for any reason?  
23 A As a result of a physical for Kyowa, which  
24 was in 1996. And there was a brief physical when I  
25 started at Organon and a very brief physical at

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1 Christian Holinka 187  
2 Johnson and Johnson.  
3 Q Were these physicals that were administered  
4 by staff doctors for each of those outfits?  
5 A J and J was a staff doctor. Organon, I  
6 believe, was a contract physician.  
7 Q Do you recall who that contract physician  
8 was?  
9 A No, I don't.  
10 Q And was there another employment physical  
11 that you had to take that you just mentioned for  
12 Kyowa?  
13 A Yes.  
14 Q Was Kyowa a contract physician or someone  
15 on staff?  
16 A Yes, he was. Dr. Meyers who is now my  
17 personal physician.  
18 Q Was that the first time that you had seen  
19 Dr. Meyers?  
20 A Yes.  
21 Q I want to, sir, have you think about the  
22 time period of your life from your birth up until  
23 approximately August or mid-year 2006, excluding  
24 everything from August '06 forward. During that time  
25 period were you ever treated in a hospital for any

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1 Christian Holinka 188  
2 reason such as emergency room or as a result of a car  
3 accident or anything like that?  
4 A No, I wasn't.  
5 Q And up until the time --  
6 MR. SCHAFFER: Withdrawn.  
7 Q Had you seen Dr. Meyers before he had  
8 administered this physical to you as a result of your  
9 Kyowa employment?  
10 A No, I had not.  
11 Q It was as a result of that physical that  
12 Dr. Meyers ultimately became your family doctor?  
13 A Yes.  
14 Q Before Dr. Meyers did you have any family  
15 doctor or general practitioner or someone you would go  
16 to if you had a cold or the flu or something like  
17 that?  
18 A No.  
19 Q Do you have copies of any of the physicals  
20 that were done with respect to your employments at  
21 Johnson or Kyowa or the other outfit?  
22 A No.  
23 Q Did any of the doctors that examined you in  
24 connection with those three employments do chest  
25 X-rays?

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1 Christian Holinka 189  
2 A I do not -- Dr. Meyers, no. Johnson and  
3 Johnson, no. Organon, no.  
4 Q When was the first time you had a chest  
5 X-ray?  
6 A As a child.  
7 Q And what was that in relation to?  
8 A Routine chest X-ray.  
9 Q And was that in Europe or over here in the  
10 States?  
11 A That was in Europe.  
12 Q Do you recall who administered that X-ray?  
13 A No.  
14 Q When would have been the next time you had  
15 a chest X-ray?  
16 A I believe in the Army. I'm not sure.  
17 Q The Army required some physical as well; is  
18 that what you are saying?  
19 A Oh, yeah.  
20 Q Let's go past the Army, do you recall  
21 having another chest X-ray up until the point of, say,  
22 mid-last year?  
23 A I don't recall but I'm virtually certain  
24 no, I did not.  
25 Q Have you ever been treated in an emergency

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Christian Holinka 190

1 room for any reason?

2 A Oh, yeah. Once at Mount Sinai.

3 Q And what happened?

4 A What happened, I had bad pain in my lower

5 left and they thought it was a kidney stone. And it

6 was a long way, I went up to my laboratory, my office,

7 it was excruciating, painful and then suddenly it went

8 away. So, I went back downstairs and told them I do

9 not need anything apparently and they sent me to a

10 Sinai associated physician whose name I don't recall

11 for, I believe, a contrast dye just to be sure that

12 there were no kidney stones and it turned out

13 negative.

14 Q So, do you recall having the contrast dye

15 done?

16 A Yes, yes, it was done.

17 Q Do you know how old you were when this

18 happened? If not that is fine.

19 A This was in the early 80's.

20 Q Have you ever had a heavy blow injury to

21 your chest?

22 A No.

23 Q Have you ever broken any ribs or been told

24 you broke any ribs?

25

Christian Holinka 192

1 I went to an internist initially.

2 Q And do you recall the internist's name?

3 A Yeah. Henrietta Mayer; M-A-Y-E-R.

4 Q And had you ever seen Dr. Mayer before?

5 A No.

6 Q How did you come to go to Dr. Mayer?

7 A She was across the street from my place.

8 Q And did Dr. Mayer do any tests?

9 A She examined me basically with a

10 stethoscope.

11 Q Did she make any recommendations as to what

12 would be the next step?

13 A Well, she said everything was normal.

14 Q You were still experiencing the shortness

15 of breath?

16 A Yes.

17 Q So, what did you do next?

18 A I ask her I would like to go to a physician

19 to have an X-ray taken and have the physician diagnose

20 the X-ray.

21 Q What did she say?

22 A She referred me immediately.

23 Q To where?

24 A To the big university clinic Charite in

25

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Christian Holinka 191

1 A As a child on a bike I once fell and they

2 thought there may be an injury to my rib.

3 Q And was this while you were in Europe?

4 A Yes.

5 Q Outside of that event any other heavy blow

6 injuries in your chest or potential rib injuries?

7 A No.

8 Q Did you notice a change in your health take

9 place sometime in the last year or so?

10 A In my general health, no.

11 Q In any aspect of your health.

12 A In July I developed some shortness of

13 breath.

14 Q And where were you when this occurred?

15 A I was in Berlin, Germany.

16 Q On vacation?

17 A On vacation.

18 Q Did you have any other symptoms besides the

19 shortness of breath at that time?

20 A No.

21 Q Did you seek medical treatment in Germany

22 for that?

23 A Yes, I did.

24 Q Where did you go?

25

Christian Holinka 193

1 Berlin.

2 Q And did you have the X-ray there?

3 A Yes.

4 Q Do you recall the names of any of the

5 doctors who treated you?

6 A Yeah. The person in charge was Professor

7 Huckauf; H-U-C-K-A-U-F.

8 Q And besides the X-ray did you have any

9 other sort of diagnostic tests there?

10 A No.

11 Q Were you told the results of the X-ray?

12 A Yes.

13 Q What were you told?

14 A I was told and shown that my right lung was

15 substantially collapsed, virtually entirely collapsed

16 and there was pleural fluid in my right chest cavity.

17 Q And Dr. Huckauf made this report to you?

18 A Yes.

19 Q And what, if anything, was recommended for

20 your next stage of treatment?

21 A The most immediate recommendation was to

22 drain the fluid.

23 Q Was that done in Germany?

24 A No. I decided to have it done here,

25



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<p>1 Christian Holinka 194</p> <p>2 immediately flew back.</p> <p>3 Q And when you flew back here, did you see a</p> <p>4 doctor first or did you just go to a hospital?</p> <p>5 A I saw Dr. Meyers.</p> <p>6 Q And did Dr. Meyers administer any tests at</p> <p>7 that time?</p> <p>8 A No, he did not.</p> <p>9 Q Did you have the X-ray from the physician</p> <p>10 in Germany?</p> <p>11 A Yes.</p> <p>12 Q Did he then admit you to have the fluid</p> <p>13 drained?</p> <p>14 A Yes, he did.</p> <p>15 Q Where was that?</p> <p>16 A At Roosevelt.</p> <p>17 Q When did you go in for that procedure?</p> <p>18 A Late August last year.</p> <p>19 Q How long were you treated there?</p> <p>20 A I believe I was in the hospital for two</p> <p>21 nights.</p> <p>22 Q Do you have an understanding as to what</p> <p>23 tests were administered to you during this stay?</p> <p>24 A Routine hospital admission tests, I imagine</p> <p>25 I had a blood test, urinalysis.</p>	<p>1 Christian Holinka 196</p> <p>2 Q Was that the first time you had seen</p> <p>3 Dr. Connory?</p> <p>4 A Yes.</p> <p>5 Q Dr. Connory's first name is Cliff; is that</p> <p>6 right?</p> <p>7 A Yes.</p> <p>8 Q When did Dr. Connory discuss any tests that</p> <p>9 were done on the fluid?</p> <p>10 A Approximately two days later, three days</p> <p>11 later.</p> <p>12 Q And was this at Dr. Connory's office?</p> <p>13 A Yes.</p> <p>14 Q Do you know how much fluid was drained?</p> <p>15 A 2.7 liters, 2,700 milliliters.</p> <p>16 Q What did Dr. Connory report to you about</p> <p>17 the results of the testing done on the fluid?</p> <p>18 A The fluid was negative.</p> <p>19 Q Did he suggest any further course of</p> <p>20 treatment or follow-up testing to be done?</p> <p>21 A Yes.</p> <p>22 Q What was suggested?</p> <p>23 A To take biopsies of several lesions he had</p> <p>24 shown in the X-ray after the fluid had been removed.</p> <p>25 Q Where to your understanding were the</p>
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<p>1 Christian Holinka 195</p> <p>2 Q X-ray, CAT scan, anything like that?</p> <p>3 A Yes, X-ray.</p> <p>4 Q Did you have the fluid drained at that</p> <p>5 time?</p> <p>6 A Yes. Dr. Connory took X-rays and I was</p> <p>7 there for two surgical procedures, the initial was to</p> <p>8 drain the fluid.</p> <p>9 Q Were both surgical procedures done during</p> <p>10 this two night stay?</p> <p>11 A No. There was another, another operation.</p> <p>12 Q I want to keep it compartmentalized if I</p> <p>13 could.</p> <p>14 A Okay, sorry.</p> <p>15 Q We will get through it all, it is just</p> <p>16 easier to do it in this fashion.</p> <p>17 The first two night stay that you were</p> <p>18 there approximately two nights, was the fluid drained</p> <p>19 at that point?</p> <p>20 A Yes.</p> <p>21 Q And then at some point did somebody report</p> <p>22 the results of any testing done on the fluid to you?</p> <p>23 A Yes, they did.</p> <p>24 Q And was that Dr. Connory?</p> <p>25 A Dr. Connory.</p>	<p>1 Christian Holinka 197</p> <p>2 lesions located?</p> <p>3 A In the visceral pleura, the pleura that</p> <p>4 lines the lung and I believe one in the diaphragm.</p> <p>5 Q Did the removal of the fluid ease your</p> <p>6 breathing problems?</p> <p>7 A Yes.</p> <p>8 Q Did you ultimately go in to have the</p> <p>9 procedures that were recommended to you by</p> <p>10 Dr. Connory?</p> <p>11 A Yes.</p> <p>12 Q And when did that take place?</p> <p>13 A About two weeks after the first operation.</p> <p>14 Q And were you admitted overnight for that?</p> <p>15 A Yes.</p> <p>16 Q How long was that admission?</p> <p>17 A I believe it was one night.</p> <p>18 Q And to your understanding were they able to</p> <p>19 obtain the biopsies?</p> <p>20 A Yes.</p> <p>21 Q Were you told the results of any testing</p> <p>22 done on the biopsies?</p> <p>23 A Yes.</p> <p>24 Q What were you told?</p> <p>25 A Bipolar mesothelioma.</p>

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1 Christian Holinka 198  
2 Q Were you familiar with that illness prior  
3 to your being diagnosed with it?  
4 A Mesothelioma? Yes.  
5 Q When did you first become familiar with  
6 mesothelioma as an illness?  
7 A Twenty years ago, fifteen years ago.  
8 Q And in what context did you first become  
9 familiar with that illness?  
10 A Through the lay literature information and  
11 very likely also chanced upon in the professional  
12 literature.  
13 Q Had you ever known anyone diagnosed with  
14 mesothelioma?  
15 A No.  
16 Q Had you ever known anyone being treated for  
17 any mesothelioma related conditions?  
18 A No.  
19 Q Dr. Connory reported these results to you?  
20 A Yes.  
21 Q Did Dr. Connory suggest what was the next  
22 stage of treatment?  
23 A May I add to this?  
24 Q Yes.  
25 A Dr. Connory and an oncology physician at

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1 Christian Holinka 199  
2 Roosevelt whose name I don't recall.  
3 Q Did Dr. Connory suggest a further course of  
4 treatment?  
5 A I ask for a second opinion --  
6 Q And did you go get --  
7 A -- before he suggested.  
8 Q Did you go get the second opinion?  
9 A Yes.  
10 Q Where was that at?  
11 A Dr. Taub at Presbyterian.  
12 Q When did you see Dr. Taub?  
13 A September last year.  
14 Q And did you have --  
15 A No, please, excuse me. It may be early  
16 October but I believe it was in September.  
17 Q And let me represent to you, sir, that we  
18 have not had an opportunity to obtain all of your  
19 medical records right now, so we will have a chance to  
20 get them all and review them. I am just asking for  
21 your best recollections.  
22 When you had the examination, the meeting  
23 with Dr. Taub, did you have your test results from St.  
24 Luke's with you?  
25 A Yes.

1 Christian Holinka 200  
2 Q And what was Dr. Taub's opinion?  
3 A He confirmed the opinion of Dr. Connory.  
4 Q Did he suggest a follow-up course of  
5 treatment?  
6 A Yes. Systemic chemotherapy and topical  
7 chemotherapy.  
8 Q Did you begin the systemic chemotherapy?  
9 A Yes.  
10 Q When did you begin that?  
11 A In late October, early November. I think  
12 it was even mid-October.  
13 Q And where were those treatments  
14 administered?  
15 A Presbyterian.  
16 Q Are you still undergoing the systemic  
17 chemotherapy?  
18 A Not at the moment. I'm on furlough as  
19 Dr. Taub said until early May.  
20 Q When did you have your last session of the  
21 systemic chemotherapy?  
22 A About mid-December, early to mid-December.  
23 Q Then you had additional chemotherapy after  
24 that?  
25 A No.

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1 Christian Holinka 201  
2 Q I'm sorry, you had mentioned two types of  
3 chemotherapy.  
4 A Yes. The topical chemotherapy was  
5 concurrent and there was one operation prior to both  
6 of them. Dr. Sonnet implanted two ports to directly  
7 administer to the thorax the cisplatin and  
8 gammafirin. (Phonetic)  
9 Q And this was all in the course of your  
10 concurrent chemotherapy treatments?  
11 A It was prior.  
12 Q Prior to it?  
13 A Yes, just prior to it.  
14 Q When was the last topical chemotherapy  
15 treatment administered?  
16 A At the same time I believe as, yes, I know,  
17 the last systemic chemotherapy.  
18 Q Were you told the results of the  
19 chemotherapy treatments at any time?  
20 A At the end of my third course.  
21 Q What were you told?  
22 A Dr. Taub told me that I'm responding well  
23 and that he was putting me on furlough, as he put it,  
24 for three months.  
25 Q Did he tell you how large the lesions were

37 (Pages 142 to 145)

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<p style="text-align: right;">Page 146</p> <p>1 Christian Holinka 202</p> <p>2 when they were first seen?</p> <p>3 A I believe he said the largest was 1</p> <p>4 centimeter.</p> <p>5 Q Do you have an understanding as to the size</p> <p>6 of the lesions now after the chemotherapy treatments?</p> <p>7 A He said it's been reduced in size.</p> <p>8 Q Did he give you any idea of the size of the</p> <p>9 reduction?</p> <p>10 A No.</p> <p>11 Q Have you had to have fluid drained since</p> <p>12 the initial draining of 2.7 liters?</p> <p>13 A No.</p> <p>14 Q Have you experienced shortness of breath</p> <p>15 since the pleura fluid was drained?</p> <p>16 A No.</p> <p>17 Q Do you take any over-the-counter</p> <p>18 medications for any pain currently that you associate</p> <p>19 with this illness as opposed to headaches?</p> <p>20 A Currently, no.</p> <p>21 Q Did you take any medications with respect</p> <p>22 to the surgeries that you had to have for the</p> <p>23 implanting of the ports or anything like that?</p> <p>24 A Some pain medicine.</p> <p>25 Q And when would have been the last time that</p>	<p style="text-align: right;">Page 148</p> <p>1 Christian Holinka 204</p> <p>2 A No.</p> <p>3 Q Is Dr. Grossban or Dr. Grossbard?</p> <p>4 A Gross.</p> <p>5 Q Grossbard or Grossband, does that name ring</p> <p>6 any bells?</p> <p>7 A I think it may have been the name of the</p> <p>8 oncologist at Roosevelt but I don't recall his name.</p> <p>9 Q And have you had any other --</p> <p>10 A Yeah, I think another physician briefly</p> <p>11 examined me in the oncology department at Roosevelt.</p> <p>12 Q And outside of the names you have mentioned</p> <p>13 and the names I have mentioned, are there any other</p> <p>14 doctors that you can recall having treated with since,</p> <p>15 say, summer of 2006?</p> <p>16 A No.</p> <p>17 Q Did any of the doctors report to you as to</p> <p>18 what they believe the cause of the bipolar</p> <p>19 mesothelioma was?</p> <p>20 A Well, Dr. Taub certainly pointed out the</p> <p>21 association between asbestos and the illness.</p> <p>22 Q Did Dr. --</p> <p>23 A With Connory I do not think we discussed</p> <p>24 causeology.</p> <p>25 Q Did Dr. Taub ask you questions as to</p>
<p style="text-align: right;">Page 147</p> <p>1 Christian Holinka 203</p> <p>2 you took any of that?</p> <p>3 A I just took it for two days after the</p> <p>4 operation.</p> <p>5 Q You say that you are currently on furlough,</p> <p>6 your word, do you have an understanding as to when</p> <p>7 your next currently scheduled medical appointment is</p> <p>8 with anybody in association with your diagnosis?</p> <p>9 A There is an interim CAT scan to be</p> <p>10 scheduled in early March, I don't know the exact date</p> <p>11 yet.</p> <p>12 Q Have you seen any other doctors in</p> <p>13 association with your diagnosis of bipolar</p> <p>14 mesothelioma?</p> <p>15 A No.</p> <p>16 Q There was an indication I think in some</p> <p>17 records that I did have a chance to look at of a</p> <p>18 Dr. Fischer, who is that?</p> <p>19 A Dr. Fischer is an old friend of mine from</p> <p>20 my undergraduate days, he's a professor of medicine at</p> <p>21 Stanford University. And Dr. Fischer, he came to New</p> <p>22 York and actually accompanied me to both Connory and</p> <p>23 Dr. Taub.</p> <p>24 Q But Dr. Fischer is not involved in your</p> <p>25 treatment regimen at all?</p>	<p style="text-align: right;">Page 149</p> <p>1 Christian Holinka 205</p> <p>2 whether you thought that you were exposed to asbestos</p> <p>3 in any way?</p> <p>4 MR. DARCHE: I am just going to object.</p> <p>5 But you can answer.</p> <p>6 A Yes, he did. And I told him about my</p> <p>7 association.</p> <p>8 Q Has anybody given you a prognosis?</p> <p>9 A No.</p> <p>10 Q Have you done any independent research</p> <p>11 yourself with respect to either the causes of</p> <p>12 mesothelioma or potential treatments?</p> <p>13 A You might not believe it but the answer is</p> <p>14 absolutely no. Psychologically it is too difficult.</p> <p>15 Q Has anybody done any research on your</p> <p>16 behalf or at your behest?</p> <p>17 A No.</p> <p>18 Q Did you ever have to care for anyone that</p> <p>19 was diagnosed with cancer?</p> <p>20 A No.</p> <p>21 Q Have you ever been diagnosed with any other</p> <p>22 type of cancer?</p> <p>23 A No.</p> <p>24 Q Besides, I believe, you said the follow-up</p> <p>25 CAT scan, do you have any other future medical</p>

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1 Christian Holinka 206  
2 appointments or treatments that you are aware of?  
3 A In early May at the end of my three months  
4 presumably Dr. Taub will see me. I'll find out in  
5 early March.  
6 MR. DARCHE: Why don't we take a little  
7 break.  
8 (Whereupon, at 2:35 P.M., a short recess  
9 was taken)  
10 (Back on the record at 2:45 P.M.)  
11 Q Sir, I just have a couple of other  
12 additional questions for you and then I am going to  
13 ss the questioning.  
14 MR. DARCHE: Your last question was still  
15 on the table, I think.  
16 MR. SCHAFFER: Could you read back the last  
17 question, please.  
18 (Whereupon, at this time, the requested  
19 portion was read back by the reporter)  
20 Q Anything else?  
21 A I would like to add this, that I have an  
22 appointment with Dr. Moline at Mount Sinai.  
23 Q An appointment for Dr. Moline to?  
24 A To examine me.  
25 Q To examine you.

1 Christian Holinka 208  
2 A I took for a brief period, I took lipitor  
3 medication and then I discontinued.  
4 Q When was that approximately?  
5 A Approximately three, four years ago.  
6 Q How tall are you?  
7 A 5'11".  
8 Q How much do you currently weigh?  
9 A 143.  
10 Q Thinking back to 2005, what was your  
11 average adult weight?  
12 A About 15 pounds more. About 162, 20 pounds  
13 more.  
14 Q Do you belong to any civic or religious  
15 organizations?  
16 A No.  
17 Q Do you have any hobbies or what do you like  
18 to do in your spare time?  
19 A Read, listen to music, do science.  
20 Q How large is the living space that you  
21 currently reside in?  
22 A 700 square feet.  
23 Q Do you need to have anybody come in to do  
24 any cleaning of those premises or do you do it  
25 yourself?

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Page 151

1 Christian Holinka 207  
2 A Yes.  
3 Q When is that scheduled for?  
4 A Tomorrow.  
5 Q Have you ever been examined by Dr. Moline  
6 before?  
7 A No.  
8 Q Did Dr. Taub refer you to Dr. Moline?  
9 A I do not know about the process.  
10 Q Are you aware of any of your doctors  
11 referring you to Dr. Moline?  
12 A No, I am not.  
13 Q Have you ever been diagnosed with diabetes?  
14 A No.  
15 Q Have you ever been diagnosed with any heart  
16 problems?  
17 A No.  
18 Q Have you ever been diagnosed with high  
19 cholesterol?  
20 A Moderately high cholesterol. Could I add  
21 to that?  
22 Q Yes, sir.  
23 A That went away, diet control and exercise.  
24 Q Did you ever have to take any medications  
25 in relation to that?

1 Christian Holinka 209  
2 A No, I do it myself.  
3 Q Have you been able to do that since your  
4 diagnosis last year?  
5 A Well, not during the operations and less so  
6 now because I do have some pain in my right chest.  
7 Q Do you have any out-of-pocket expenses  
8 associated with any of the medical treatments or  
9 procedures that you have undergone since mid-2006?  
10 A Yes.  
11 Q And can you give me a best estimate as to  
12 how much you are out of pocket, what you have not been  
13 covered for?  
14 A At this time about \$500, \$700.  
15 Q And have you incurred any other  
16 out-of-pocket expenses associated with any chores or  
17 other responsibilities that you might have?  
18 A No. Occasionally a taxi to Columbia.  
19 MR. SCHAFFER: All right, sir, I am going  
20 to pass the questioning right now to one of my  
21 colleagues here. I want to thank you very much  
22 for your time and for your patience.  
23 THE WITNESS: Thank you.  
24 CROSS-EXAMINATION  
25 BY MR. ABERNETHY:

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1 Christian Holinka 210

2 Q Good afternoon.

3 A Good afternoon.

4 Q My name is David Abernethy. I am with the

5 law firm of Drinker, Biddle and Reath in Philadelphia,

6 Pennsylvania. I represent Univar USA, Incorporated

7 and VWR International, Incorporated which are two of

8 the defendants in this lawsuit.

9 All the same instructions that you were

10 previously given still hold including, of course,

11 letting me know if you need to clarify a question or

12 if you need a break for any reason.

13 I want to start -- and let me add one more

14 thing: I am going to be touching on testimony and

15 questions that you have already given. It may seem

16 like I am jumping around a little bit, at times it may

17 seem a little bit repetitious. I will try not to

18 repeat any more than I absolutely have to for context

19 but when you go second or third or fourth, you are

20 asking about things that have already been covered to

21 some extent, so you have to do some of that.

22 You were asked a lot of questions --

23 MR. DARCHE: And if you get tired or you

24 want to stop, just let us know, it is not a

25 marathon.

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1 Christian Holinka 211

2 Q Yes. If it becomes necessary to stop, you

3 can let us know that or if you just need a break.

4 You were asked a number of questions about

5 where certain of the places you worked got particular

6 products, particularly the Bunsen burner pads and

7 mittens and I want to get into that in a minute but

8 first I would like you to clarify something for me

9 about Bunsen burners.

10 Did any of the Bunsen burners themselves

11 that you worked with have any asbestos in them or was

12 it just the Bunsen burner pads?

13 MR. DARCHE: I am going to object to the

14 form for lack of foundation.

15 But you can answer.

16 A To my knowledge, no, they did not contain

17 asbestos.

18 Q The burners themselves did not?

19 A That's correct, they did not.

20 Q So, if you had any exposure to asbestos in

21 connection with the use of Bunsen burners, it was

22 either from the pads or from the mittens you used with

23 the glassware; is that right?

24 A That's correct.

25 Q Now, if you could clarify something for me

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1 Christian Holinka 212

2 with respect to the pads. If I understood your

3 testimony correctly, the pads were a wire mesh of some

4 kind with a round asbestos-containing pad inside?

5 A Yes.

6 Q Was the mesh completely closed in those

7 things so that it is just one closed item or unit; do

8 you know what I mean?

9 A The inside pad and the mesh were one unit.

10 Q And when you would discard one of these

11 things after it had been used for a while, which you

12 described earlier, would you throw the whole thing

13 away, both the pad and the mesh, or just throw the pad

14 away and put a new pad inside the old mesh?

15 A We would throw the whole thing away.

16 Q So it was all one product that you used

17 and then threw away.

18 A Yes.

19 Q You were asked a lot of questions about who

20 supplied or manufactured certain products and a number

21 of times you referred to standard suppliers; do you

22 recall that?

23 A Yes, I do.

24 Q I need to get a little more detail about

25 that from you. Let me start backwards if I could with

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1 Christian Holinka 213

2 Mount Sinai, the time that you worked in the lab as an

3 instructor or assistant professor. Tell me again all

4 the companies that you recall that you described as

5 standard suppliers at Mount Sinai?

6 A I recall the major companies, Fisher

7 Scientific, Van Waters and Rogers, American

8 Scientific, Senco. And others were for specific

9 things like hormones or specific research areas.

10 Q And when you referred to these four

11 companies that you just listed as major suppliers,

12 what is the basis for that, did you know, did you have

13 actual knowledge that they sold products that were

14 used in the lab at Mount Sinai?

15 (All defendants object to the form)

16 THE WITNESS: Can I answer?

17 MR. DARCHE: You can answer.

18 A Yes, I did.

19 Q And how did you know that they sold

20 products to --

21 A Well -- sorry.

22 MR. DARCHE: Let him finish.

23 Q How did you know that those companies sold

24 products that were used in the lab at Mount Sinai?

25 A First, we had large catalogs of those



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1 Christian Holinka 214  
2 companies. They're really catalogs, that's an  
3 understatement, they're like books, 600, 800 pages,  
4 whatever, with the names of those companies in the  
5 back of the books clearly visible.  
6 Secondly, for my specific research I  
7 actually ordered, may have ordered things from those  
8 companies. If you needed a small or a minor flask or  
9 something specifically related to your own research.  
10 Q You started by saying "ordered" and then  
11 you said "may have ordered," which is it? Do you have  
12 an actual recollection of specific companies that you  
13 ordered from for your research at Mount Sinai?  
14 A I did order from certainly any one or  
15 several of those companies, I could not tell you at  
16 this time which one and what I ordered.  
17 Q And you said for your specific research.  
18 When you ordered for your specific research, were you  
19 ordering general lab supplies or unusual things that  
20 were just needed for your work?  
21 MR. DARCHE: I am going to just object to  
22 the terminology of "unusual."  
23 MR. ABERNETHY: Let me rephrase the  
24 question.  
25 Q When you yourself went to -- would you ask

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1 Christian Holinka 215  
2 someone to order for you or would you actually do the  
3 ordering yourself?  
4 A I would ask somebody to include it in  
5 another order unless it was very urgent. And as I  
6 said that we may, may even have had a special ordering  
7 venue with one or several companies.  
8 Q When you asked someone at Mount Sinai to  
9 order something specifically for your research, who  
10 was the person that you asked?  
11 A My technician or the head of the  
12 laboratory.  
13 Q Did you ever specifically ask for Bunsen  
14 burner pads or mittens to be ordered specifically for  
15 your research?  
16 A No, I did not.  
17 Q So, those were the general supplies that  
18 were ordinarily ordered?  
19 A That is correct. Standard laboratory  
20 equipment.  
21 Q And who was the person who ordered those  
22 general kinds of supplies at Mount Sinai?  
23 A At my laboratory I could not tell you. We  
24 may have gotten it from the central supply room.  
25 Q So, whoever the actual employee was at

1 Christian Holinka 216  
2 Mount Sinai who got those things from the companies,  
3 you do not know the person's name?  
4 A My technician may have gotten some but I do  
5 not recall the details.  
6 Q Can you tell me from your own knowledge  
7 which, if any, of those major suppliers sold Bunsen  
8 burner pads to Mount Sinai, which specific companies?  
9 A I would not know a specific company.  
10 Q Can you tell me which specific companies  
11 among those four, if any, sold mittens to Mount Sinai?  
12 (All defendants object)  
13 A No, I could not.  
14 Q Did you ever talk to any of the people who  
15 ordered supplies at Mount Sinai about which specific  
16 companies they ordered specific items from?  
17 A No, I didn't.  
18 Q Did you ever see any documents at Mount  
19 Sinai that indicated what company's particular items  
20 had been ordered from?  
21 A To the best of my knowledge, yes, ordering  
22 forms that specified VWR, Fisher Scientific.  
23 Q Let me ask you about that. When you say  
24 ordering forms, do you mean the blank forms that were  
25 used to place an order or a form that had already been

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1 Christian Holinka 217  
2 filled out with a specific order?  
3 A Very likely both, filled out forms and  
4 blank forms. And I do not even recall the type of the  
5 form.  
6 Q Do you recall any of the specific contents  
7 of any filled out forms that listed specific items  
8 that were being ordered?  
9 A No, I don't.  
10 Q Where were the catalogs at Mount Sinai?  
11 A At the laboratory, shelves.  
12 Q How many catalogs were there?  
13 A Twenty, twenty-five.  
14 Q Did each catalog cover a different company?  
15 A Yes.  
16 Q Do you remember the names of any of the  
17 other companies?  
18 A No, I don't.  
19 Q Did any of the other companies other than  
20 the four that you listed sell Bunsen burner pads?  
21 MR. DARCHE: If you know.  
22 Q Well, they are all if you know. Let me  
23 repeat what has already been said: I only want to  
24 know what you know, I do not want you to guess.  
25 A I don't know.

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1 Christian Holinka 218  
2 Q You do not know whether any of the others  
3 did or didn't.  
4 A That's correct, I don't know.  
5 Q Do you know whether any of the companies  
6 other than those four that you just named sold  
7 asbestos mittens?  
8 A I don't know.  
9 Q Who else used the catalogs or --  
10 MR. ABERNETHY: Let me withdraw that.  
11 Q Who else looked at the catalogs besides  
12 you, if you know?  
13 A In terms of names or people that worked at  
14 the lab?  
15 Q Either. Whatever information --  
16 A Pretty much graduate students and post  
17 docs, post doctoral students.  
18 Q Did the graduate students or post doctorate  
19 students order from the catalogs?  
20 A Very likely, yes. That was the source of  
21 information.  
22 Q While you were at Mount Sinai, did you ever  
23 see any of the original packaging or crates or cartons  
24 that any Bunsen burner pads came in?  
25 A No, I did not.

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1 Christian Holinka 219  
2 Q While you were at Mount Sinai, did you ever  
3 see any of the original packaging or cartons or crates  
4 that asbestos mittens came in?  
5 A To the best of my recollection, I did not.  
6 Q Do you know whether or not Mount Sinai  
7 bought asbestos Bunsen burner pads from any companies  
8 other than the four that you specifically recall the  
9 names of?  
10 A I do not know.  
11 Q Do you know if they bought mittens from any  
12 other companies?  
13 A I do not know.  
14 Q Let me touch on a question that you were  
15 asked with respect to certain places but I want to  
16 make sure that we covered it for all.  
17 During any of the time periods that you  
18 worked with Bunsen burner pads, were there any pads  
19 sold by any specific company that looked unique or  
20 different from the pads sold by other companies?  
21 MR. DARCHE: I am just going to object to  
22 the form and the basis is it is too broad. Is  
23 there a specific, is there a specific, you know,  
24 thing that you are -- it would be different if  
25 you are talking about the size, the width, the

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1 Christian Holinka 220  
2 color, it could be a million things.  
3 MR. ABERNETHY: Let me try it a different  
4 way and we will break it down so that we are not  
5 too broad, we will take it place by place.  
6 Q While you worked with or handled Bunsen  
7 burner pads at Mount Sinai, if you went into the lab  
8 on a particular day and picked up a particular pad,  
9 would there be anything about the appearance of that  
10 pad that would enable you to identify who specifically  
11 made or sold it?  
12 A Not about the appearance but in retrospect  
13 it is likely that they were different sizes.  
14 Q You used that term before "it is likely," I  
15 want to probe that a little bit more.  
16 A Or it -- okay.  
17 Q Let me ask you a specific question: Do you  
18 specifically recall as you sit here today handling  
19 different sizes of Bunsen burner pads?  
20 A No, I don't.  
21 Q Is there anything that you can recall about  
22 any specific Bunsen burner pad that you handled at  
23 Mount Sinai that enabled you to identify it as coming  
24 from a particular maker or supplier?  
25 A No.

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1 Christian Holinka 221  
2 Q So, as a general rule if you went into the  
3 lab and picked up a pad, it could have come from any  
4 number of companies, you would not know which one just  
5 by looking at it, correct?  
6 A That's correct, I wouldn't know which one.  
7 Q Were there any asbestos mittens that you  
8 handled in the lab at Mount Sinai at any time that you  
9 were able to identify the maker or supplier from the  
10 size, appearance, color or any other observable  
11 characteristics?  
12 A No, I would not be able to identify.  
13 Q Is that true of the other places that you  
14 handled asbestos mittens, the earlier employment or  
15 lab work that you did? Were there ever any asbestos  
16 mittens that you handled that you could identify the  
17 maker or seller by something about the appearance?  
18 A No, I couldn't. But may I add a but to  
19 this?  
20 MR. DARCHE: Go ahead.  
21 A I have no idea if perhaps there was a  
22 little bit in the bag, a tiny label inside which is  
23 unlikely. But ordinarily, ordinary use I would not be  
24 able to identify one company from another.  
25 Q Did you ever see a label on any asbestos

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1 Christian Holinka 222  
2 mittens at any location --  
3 A No.  
4 Q -- that identified the maker or seller?  
5 A No, I did not.  
6 Q Did you ever see a label or a logo or a  
7 word or symbol or imprint or anything physically  
8 observable on a Bunsen burner pad that told you who  
9 made or sold that pad?  
10 A No, I did not.  
11 Q Let me ask you a few questions about the  
12 mittens. In the mittens that you worked with in labs  
13 that you believe contained asbestos, where physically  
14 in the product was the asbestos?  
15 A I do not know but they were identified as  
16 asbestos mittens.  
17 Q How were they identified as asbestos  
18 mittens?  
19 A In the catalogs.  
20 Q Did you ever order mittens from any catalog  
21 yourself?  
22 A No, I did not.  
23 Q When you worked with mittens in the labs,  
24 the various labs that you worked in, did you ever  
25 compare a particular set of mittens to an entry or a

1 Christian Holinka 224  
2 in the lab that they contained asbestos because some  
3 of the catalogs referred to asbestos mittens?  
4 MR. DARCHE: Objection to the form. It  
5 mischaracterizes the witness' prior testimony  
6 that also said it was stated by colleagues and  
7 co-workers that these gloves were asbestos.  
8 MR. ABERNETHY: Well, first of all, I am  
9 not characterizing his testimony, I am not asking  
10 him about his testimony. I am asking him why he  
11 thought a particular thing and he can tell me. I  
12 would rather have him tell me than have you  
13 testify for him as to why he --  
14 MR. DARCHE: I just ask that you rephrase  
15 the question.  
16 Q You saw catalog pages from time to time  
17 that referred to asbestos mittens, correct?  
18 A Yes.  
19 Q Did you have any other basis for believing  
20 that a particular pair of mittens contained asbestos?  
21 A It was common knowledge in our working  
22 situation.  
23 Q Any other basis for believing that the  
24 mittens that you used contained asbestos beyond what  
25 you have already told me?

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1 Christian Holinka 223  
2 picture in a catalog to confirm that they contained  
3 asbestos?  
4 MR. DARCHE: I am going to object. You  
5 cannot confirm it by -- I am going to object to  
6 the form.  
7 MR. ABERNETHY: Object to the form, do not  
8 testify as to why you think something is or  
9 isn't.  
10 MR. DARCHE: I am going to object to the  
11 form of the question, there you go.  
12 MR. ABERNETHY: Let me rephrase it and  
13 maybe this will satisfy your concern.  
14 Q When you used the asbestos mittens in the  
15 lab, did you always have the catalog handy to look at  
16 at the same time?  
17 A No.  
18 Q Did you ever look at the catalog while you  
19 were holding or using a pair of asbestos mittens?  
20 A No.  
21 Q Did any of the companies from whom these  
22 labs ordered mittens sell mittens that did not contain  
23 asbestos, if you know?  
24 A I don't know.  
25 Q Did you simply assume when you used mittens

1 Christian Holinka 225  
2 A No.  
3 Q Do you have any knowledge as to what  
4 portions of the mittens, what physical parts of the  
5 product contained asbestos?  
6 A No.  
7 Q Describe the mittens for me a little bit  
8 more if you could; what was the outside made of, the  
9 outside surface made of or what did it appear to be  
10 made of?  
11 A Well, it was -- that's a difficult  
12 question. It was a somewhat coarse material, tanish,  
13 grayish. I don't have an obvious comparison. And  
14 certainly relatively sturdy, it wasn't like cloth.  
15 Q Would you compare, would it be fair to  
16 compare it to some kind of coarse or rough fabric of  
17 some kind?  
18 A Yes.  
19 Q What was underneath that outer surface, if  
20 you know?  
21 A I don't know.  
22 Q Did you ever see what was underneath the  
23 outer surface?  
24 A No.  
25 Q Did you ever cut open a pair of gloves to

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1 Christian Holinka 226  
2 see?  
3 A No.  
4 Q Did you ever see a glove that was torn open  
5 so that you could see inside?  
6 A No.  
7 Q Do you know anything about what was the  
8 appearance or characteristics of the gloves other than  
9 what you could observe or feel on the outer surface?  
10 A No. Other than their shape, that's part of  
11 the appearance.  
12 Q Was the surface on the inside —  
13 MR. ABERNETHY: Let me rephrase.  
14 Q Was the surface that touched your hand as  
15 opposed to the surface facing away from your hand, was  
16 that the same material, those two sides?  
17 MR. DARCHE: If you remember.  
18 A I do not recall.  
19 Q Were all the mittens that you used in the  
20 various labs in which you worked or did academic  
21 research the same color or approximately the same  
22 color?  
23 A Yes.  
24 Q You do not recall any that had any  
25 distinctive color that stood out like bright blue or

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1 Christian Holinka 227  
2 red or anything like that?  
3 A No, I do not recall.  
4 Q Was there anything about the design or  
5 construction of any particular pair of asbestos gloves  
6 or mittens that looked different than the others?  
7 A No, not to my knowledge.  
8 Q If I touched on this already, I apologize:  
9 Did you ever use any specific set of asbestos mittens  
10 that had something distinct or observable about it  
11 that enabled you to identify who made them or sold  
12 them?  
13 MR. DARCHE: I am going to object to the  
14 form.  
15 But you can answer.  
16 A No.  
17 Q How do you believe you were exposed to  
18 asbestos from mittens?  
19 MR. DARCHE: I am going to object that this  
20 was gone over.  
21 But you can answer again.  
22 MR. ABERNETHY: I think he testified as to  
23 how he used mittens and what they were used for.  
24 Q What I am trying to find out is how, if you  
25 know, did asbestos actually get from the mittens into

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1 Christian Holinka 228  
2 your body, if it did.  
3 A Debris, micro debris, if you want, dust.  
4 The gloves, of course, were used to handle very hot  
5 materials and heat has deteriorating effects on any  
6 material. So, over longer periods of time there was  
7 disintegration, it's inevitable of any material that  
8 you use in this particular circumstance.  
9 Q So, am I correct that you believe or  
10 observed that whatever was in that, on that surface of  
11 the glove would degrade over time and give off dust?  
12 A The surface as well as perhaps the inside.  
13 Q Did you ever see — I thought you testified  
14 a few minutes ago you never saw the inside of any  
15 glove.  
16 MR. DARCHE: I am just going to object to  
17 the argumentative nature of that question.  
18 MR. ABERNETHY: I will rephrase it.  
19 Q Do you recall testifying a few minutes ago  
20 that you did not see the inside of any asbestos  
21 mittens?  
22 MR. DARCHE: I am going to object to the  
23 form, it mischaracterizes his testimony. That  
24 was not the question asked.  
25 MR. ABERNETHY: Well, that is my question.

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1 Christian Holinka 229  
2 MR. DARCHE: You can answer if you can.  
3 A Okay, I don't recall exactly whether I said  
4 I didn't see it. Wasn't the question more whether the  
5 outside and the inside were similar?  
6 Q Did you ever see the material that was  
7 underneath the external surface of the asbestos  
8 mittens that you worked with?  
9 A I did not.  
10 MR. DARCHE: Off the record.  
11 (Discussion held off the record)  
12 Q Do you recall any of the specific companies  
13 that sold Bunsen burner pads to the lab that you  
14 worked in at Columbia Presbyterian?  
15 A No, I don't.  
16 Q Do you recall any of the specific companies  
17 that sold Bunsen burner pads to the lab that you  
18 worked in at SUNY Stony Brook?  
19 A No, I don't.  
20 Q Do you recall any of the specific companies  
21 that sold Bunsen burner pads to the lab where you did  
22 your chemistry lab at Hunter College?  
23 A No.  
24 Q Do you recall any of the specific companies  
25 that sold Bunsen burner pads to the laboratory where



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Christian Holinka 232

1 you did your academic work at the University of  
2 California at Berkeley?  
3 A No, I don't. But with there again, it was  
4 a large research unit and they used standard  
5 suppliers.  
6 Q And tell me again who the standard  
7 suppliers were that you recall that were used in the  
8 large research lab at UC Berkeley.  
9 A Fisher Scientific, Van Waters and Rogers,  
10 American Scientific, Senco.  
11 Q But as you sit here today, can you tell me  
12 which specific companies, if any, in that group sold  
13 Bunsen burner pads for that lab?  
14 A I could not.  
15 Q Do you know whether any other companies  
16 sold Bunsen burner pads to that lab?  
17 A I do not know.  
18 Q Do you know whether any other companies  
19 sold Bunsen burner pads to the lab at Hunter College?  
20 A No, I don't know.  
21 Q Do you know if any other companies sold  
22 Bunsen burner pads to the lab at SUNY Stony Brook?  
23 A No, I don't know.  
24 Q Do you know if any other companies sold  
25

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Christian Holinka 233

1 A No, I don't.  
2 Q Do you know if any companies other than  
3 those you described as the standard suppliers did?  
4 A No, I don't.  
5 Q Without going through every location let me  
6 just ask you this: Do you recall as you sit here  
7 today ever discussing with any of the people who were  
8 responsible for ordering supplies at any of these labs  
9 the specific sources they used to get Bunsen burner  
10 pads?  
11 A No, I do not recall.  
12 Q Do you recall ever talking with any of  
13 those people about the specific sources they used to  
14 get asbestos mittens?  
15 A No, I do not recall.  
16 Q Do you have or do you know the location of  
17 any documents that might indicate what specific  
18 companies sold to any of the labs where you worked?  
19 A No, I don't.  
20 Q Do you recall answering written questions  
21 called interrogatories in connection with this  
22 lawsuit?  
23 MR. DARCHE: Answer the question to the  
24 best of your ability, if you can.  
25



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1 Christian Holinka 234  
2 A I filled out some questionnaires related to  
3 Mr. Darche's questions.  
4 Q Is it your understanding that your lawyers  
5 served on the other parties to this case written  
6 answers to specific questions including questions  
7 about your asbestos exposures, do you have an  
8 understanding about that?  
9 A No, I don't have any direct understanding.  
10 Q I will represent to you that it is my  
11 understanding that answers to written interrogatories  
12 were served on your behalf in this litigation and one  
13 of the answers to the written interrogatories makes  
14 reference to potential exposure to asbestos in  
15 connection with a product called an autoclave. Do you  
16 recall answering any question indicating that you were  
17 exposed to asbestos from a product called an  
18 autoclave?  
19 MR. DANCHE: Objection. The  
20 interrogatories that you are referring to were  
21 not verified by this witness, so it is my  
22 position that you are not really confronting him  
23 with something that he has verified.  
24 MR. ABERNETHY: Well, forget the  
25 verification, let me just ask a simpler question.

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1 Christian Holinka 235  
2 Q Do you believe that you were exposed to  
3 asbestos at any location from a product called an  
4 autoclave?  
5 A I'm not sure. Initially I thought maybe  
6 but I'm not even sure if it contains, an autoclave  
7 contains asbestos.  
8 Q You are familiar with a product or a type  
9 of product referred to as an autoclave?  
10 A Yes.  
11 Q What is an autoclave?  
12 A An autoclave sterilizes at high heat and  
13 steam bacterial cultures or anything that you may want  
14 to sterilize.  
15 Q In any of the laboratory or other work that  
16 you have done, which the other counsel went over in  
17 great detail earlier, in any of that work did you work  
18 with autoclaves?  
19 A I did in the Army and I did at Sinai.  
20 Q What specifically did you do with  
21 autoclaves in the Army?  
22 A Put in bacterial cultures, TB cultures,  
23 gonorrhea cultures after you had diagnosed them and  
24 sterilized them.  
25 Q Do you know the makers or suppliers of any

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1 Christian Holinka 236  
2 of the autoclaves that you worked with in the Army?  
3 A I don't.  
4 Q Can you describe the physical appearance of  
5 any of the autoclaves you worked with in the Army?  
6 A Yeah. It's typically a large round tube  
7 about -- stainless steel on the outside, about 4 feet,  
8 5 feet long, about 3 feet in diameter that has a door  
9 with this circular handle to close tight and then you  
10 push a few buttons to let the steam and the heat in.  
11 Q Did you work with more than one autoclave  
12 while you were in the Army?  
13 A I don't recall exactly but I don't believe  
14 so.  
15 Q And am I correct you do not know who made  
16 or sold that autoclave, the one that you remember?  
17 A You are correct, I don't remember.  
18 Q And as you sit here today you do not  
19 remember whether it contained any asbestos or not?  
20 A That's correct, I don't know.  
21 Q What did you do with an autoclave or  
22 autoclaves at Mount Sinai?  
23 A Sterilize cell cultures, culture dishes and  
24 media.  
25 Q Was it one device that you worked with

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1 Christian Holinka 237  
2 there or more than one?  
3 A One device.  
4 Q Can you describe what it looked like?  
5 A Comparable to my earlier description. You  
6 want me to repeat it?  
7 Q You do not have to repeat the earlier  
8 description but do you remember what color it was?  
9 A Also stainless steel.  
10 Q Do you know what the source of power or  
11 heat for it was?  
12 A No, I don't.  
13 Q Do you know who made it or sold it?  
14 A I don't.  
15 Q And you do not know whether it contained  
16 any asbestos?  
17 A No, I don't know.  
18 Q Did you have any involvement in ordering or  
19 buying the autoclave at Mount Sinai?  
20 A No.  
21 Q Was it there when you got there?  
22 A Yes.  
23 Q Was the same one in use when you left?  
24 A Yes.  
25 Q Did it have any logo, marking, nameplate,

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1 Christian Holinka 238  
2 anything identifying marked on it?  
3 A It very likely did.  
4 Q Do you recall what it said?  
5 A No, I don't.  
6 Q Where was it located in the lab?  
7 A It was located in the culture room.  
8 Q Do you know when that device was acquired  
9 by Mount Sinai?  
10 A No, I don't.  
11 Q Do you know when it was put in service?  
12 A I don't.  
13 Q Between the time that you were told that  
14 you had been diagnosed with bipolar mesothelioma and  
15 today, have you looked at any catalogs for laboratory  
16 supplies or any portions of any such catalogs?  
17 A I have not.  
18 Q Have you talked to anyone other than your  
19 counsel about the potential suppliers of any of the  
20 laboratory equipment that you worked with in the  
21 various locations where you did research or academic  
22 work while you were employed?  
23 A I have not.  
24 Q When was the last time you can recall  
25 seeing any catalog from any of the suppliers that you

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1 Christian Holinka 239  
2 mentioned by name earlier in your testimony?  
3 A In 1989 at Sinai.  
4 Q Did you do laboratory work at Mount Sinai  
5 only at one location?  
6 A On one floor in several rooms.  
7 Q But it was just in that one building, not  
8 in any other facility?  
9 A Yes, only on the 20th floor.  
10 Q Since the time that you were diagnosed with  
11 bipolar mesothelioma we are told that you had been  
12 given this diagnosis, have you had any conversation  
13 with any former co-workers or supervisors about any of  
14 the asbestos exposures that you believe you may have  
15 had?  
16 A Not about the asbestos exposure, no.  
17 Q What have you talked to them about?  
18 A My diagnosis.  
19 MR. DARCHE: Just note my objection.  
20 You can answer.  
21 Q And in the context of those discussions  
22 about your diagnosis, your asbestos exposure was not  
23 discussed with any of them?  
24 A Well, it was pretty much recognized that  
25 that was -- well, they really knew that this related

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1 Christian Holinka 240  
2 to asbestos.  
3 MR. DARCHE: Answer his question.  
4 A Would you repeat the question again?  
5 Q Were any of the specific facts of your  
6 exposures to asbestos discussed in any of the  
7 conversations that you have had with any former  
8 co-workers since the time you were told of your  
9 diagnosis?  
10 A I don't understand what you mean by  
11 specific facts.  
12 Q Did you talk to them about any of the  
13 circumstances under which you believe you had been  
14 exposed to asbestos?  
15 A I did talk to them but not about specific  
16 facts as to the origin of the asbestos. Simply in  
17 relation to my research activities.  
18 MR. SCHAFFER: I'm sorry, could you read  
19 back that answer, please.  
20 (Whereupon, at this time, the requested  
21 portion was read back by the reporter)  
22 Q As you sit here today, do you know the  
23 residence or business address of any of the people  
24 that you worked with in any of the locations where you  
25 believe you were exposed to asbestos?

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1 Christian Holinka 241  
2 A I do but in some instances, but not right  
3 here, I couldn't give it to you right now.  
4 Q Do you have any of that information  
5 recorded in an address book or a document or anything  
6 of that nature?  
7 A I do have an address book, yes, with some  
8 of their names.  
9 Q So, you do not recall them, you do not  
10 recall street numbers, city, town, zip code as you sit  
11 here but you have some of them written down.  
12 A That's correct.  
13 MR. DARCHE: Off the record.  
14 (Discussion held off the record)  
15 Q This topic was touched on, I think, in at  
16 least a couple of locations but I am not sure it was  
17 covered for all, so let me just ask you a couple of  
18 questions briefly about the different places that you  
19 worked.  
20 While you were at Mount Sinai, to your  
21 knowledge were there asbestos materials installed in  
22 the building in any of the locations where you worked?  
23 A No, there weren't.  
24 Q Was there any substantial renovation work  
25 done while you were at Sinai in any of the specific

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<p style="text-align: right;">Page 186</p> <p>1 Christian Holinka 242</p> <p>2 locations where you worked?</p> <p>3 A No.</p> <p>4 Q Was there any asbestos material to your</p> <p>5 knowledge installed in the building in any of the</p> <p>6 locations where you did work at Columbia Presbyterian?</p> <p>7 A To my knowledge, no.</p> <p>8 Q Were there any renovations of any substance</p> <p>9 done in the areas where you worked at Columbia</p> <p>10 Presbyterian while you were there?</p> <p>11 A No.</p> <p>12 Q Was there any asbestos material to your</p> <p>13 knowledge installed in the lab where you did work at</p> <p>14 SUNY Stony Brook?</p> <p>15 A No.</p> <p>16 Q Were there any renovations done to that lab</p> <p>17 while you were employed there or while you did your</p> <p>18 academic work there?</p> <p>19 A No.</p> <p>20 Q Was there any asbestos material installed</p> <p>21 in any of the facilities at Hunter College while you</p> <p>22 were studying there?</p> <p>23 A Not to my knowledge.</p> <p>24 Q Were there any renovations done in any of</p> <p>25 the locations where you were living or studying or</p>	<p style="text-align: right;">Page 188</p> <p>1 Christian Holinka 244</p> <p>2 A No.</p> <p>3 MR. ABERNETHY: Those are all the questions</p> <p>4 I have for you. Thank you very much.</p> <p>5 MR. DARCHE: We will stop now for the day</p> <p>6 and I will send out a deposition notice tomorrow.</p> <p>7 (Whereupon, at 3:40 P.M., the</p> <p>8 examination of this witness was concluded)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 187</p> <p>1 Christian Holinka 243</p> <p>2 doing lab work at Hunter College?</p> <p>3 A No.</p> <p>4 Q Was there any asbestos material installed</p> <p>5 in any of the labs where you worked or did research or</p> <p>6 academic work at the University of California at</p> <p>7 Berkeley?</p> <p>8 A No.</p> <p>9 Q Were there any renovations underway in any</p> <p>10 of the classrooms or laboratory space where you</p> <p>11 studied or did research work or were employed at the</p> <p>12 University of California at Berkeley?</p> <p>13 A No.</p> <p>14 Q Were there any asbestos materials installed</p> <p>15 anywhere where you worked at Booth Hospital?</p> <p>16 A No.</p> <p>17 Q Was that lab renovated at all while you</p> <p>18 were working there?</p> <p>19 A No, it wasn't.</p> <p>20 MR. ABERNETHY: Bear with me just one</p> <p>21 second.</p> <p>22 Q Was there any substantial renovation work</p> <p>23 done while you were employed in any of the facilities</p> <p>24 where you worked when you were employed by the</p> <p>25 pharmaceutical companies that you mentioned earlier?</p>	<p style="text-align: right;">Page 189</p> <p>1 Christian Holinka 245</p> <p>2</p> <p>3 WITNESS CERTIFICATION</p> <p>4</p> <p>5 I have read the foregoing transcript of my</p> <p>6 testimony and find it to be true and accurate to</p> <p>7 the best of my knowledge and belief.</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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CERTIFICATE OF NOTARY

I, CHERYL F. BAREN, a Stenotype Shorthand Reporter and Notary Public within and for the State of New York, do hereby certify that the within Continued Examination Before Trial of CHRISTIAN HOLINKA was held before me and I faithfully and impartially recorded stenographically the questions, answers and colloquy.

I further certify that after said examination was recorded stenographically by me, it was reduced to typewriting under my supervision, and I hereby submit that the within contents of said examination are true and accurate to the best of my ability.

I further certify that I am not a relative of nor an attorney for any of the parties connected with the aforesaid examination, nor otherwise interested in the testimony of the witness.

\_\_\_\_\_  
CHERYL F. BAREN

20 (Pages 190 to 191)